

STATE OF COLORADO
COMMON MEASURES WAIVER REQUEST UNDER THE WORKFORCE
INVESTMENT ACT
December 2006

The Colorado Department of Labor and Employment (CDLE), the state administrative entity for the Workforce Investment Act (WIA), is requesting a waiver of the legal requirement to utilize the 17 WIA performance measures. The waiver would allow the exclusive use of the Common Performance Measures for performance accountability and reporting for the WIA Adult, Youth, and Dislocated Worker programs. Should the waiver be granted, this would allow workforce regions focus additional resources on increased training opportunities and regional workforce strategies.

This waiver request follows the format identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 661.420(c).

1. Statutory Regulations to be Waived: Colorado seeks to waive Section 136(b), which defines the current WIA Title I performance measures. We are requesting that the State be allowed to replace the exiting 17 measures (15 core and 2 customer satisfaction) with the Common Measures delineated in TEGL 17-05. For Program Year 2006, the State of Colorado would be operating under nine (9) measures: Adult Entered Employment, Adult Retention, Adult Average Earnings, Dislocated Worker Entered Employment, Dislocated Worker Retention, Dislocated Work Average Earnings, Youth Placement in Employment or Education, Youth Attainment of a Degree or Certificate, and Youth Literacy and Numeracy Gains.

Colorado's structure for the WIA consists of the Office of Workforce Development (OWD) and the State Workforce Development Council (SWDC), which perform policy functions, and the Colorado Department of Labor and Employment, which is responsible for providing the administrative and fiscal management systems for program implementation. The planning and delivery of services is performed at the local level, embodying the Colorado tradition of local control. A strong state and local partnership has resulted in the achievement of all 17 WIA performance measures for PY00 through PY05, with Colorado exceeding performance measures and receiving performance incentive grants for four of the six years.

During PY05 Colorado completed software enhancements within our statewide database that allow us to track and report the Common Measures concurrently with the WIA measures. We have also conducted statewide training regarding the Common Measures and provided technical assistance for local implementation of the measures, given that customers exited after October 1, 2006 may be counted in the Common Measures, should they be implemented July 1, 2007. As a result, local regions are effectively operating under two sets of performance measures, causing duplication of effort and use of additional resources for performance reporting.

2. State or Local Statutory Regulatory Barriers: There are no state or local statutory or regulatory barriers to implementing the proposed waiver. State Workforce Development Board and CDLE policies are in compliance with current Federal guidelines. Upon notification of

approval of this waiver request, CDLE policy will be amended to comply with the terms of the waiver.

3. Goals and Programmatic Outcomes to be Achieved by the Waiver:

- Provides for a simplified and streamlined measurement system, which is not only more cost effective, but is more transparent to our business partners and service providers.
- Provides for making the system more demand-driven, governed by business-led workforce investment boards. The existing 17 measures are difficult for staff to manage and board members to understand and successfully monitor
- Provides for more integrated management of the Wagner-Peyser, Veterans, and Trade Act Programs, which have already gone to the Common Measures
- Will allow redirection of resources to increased training opportunities and regional workforce strategies by reducing paperwork and labor costs associated with duplicative performance data collection.

4. Individuals Impacted by the Waiver: This waiver will benefit local Boards, One-Stop Centers, employers, customers, and service providers. The following are expected to be additional impacts of the proposed waiver:

- Program participants will benefit because local Boards will have added flexibility and resources to design programs based on regional needs and priorities.
- More customers will have access to training services.
- Businesses will benefit from regional strategies and greater integration of programs

5. Process Used to Monitor Progress in Implementing the Waiver: CDLE has a Federally recognized monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct onsite quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite utilizing outcome reports generated from CDLE's statewide database. Should this waiver request be granted, CDLE will ensure regular review of the Adult and Dislocated Worker programs to monitor outcomes and impacts of the additional fund transfer authority.

6. Process for Notice of Local Boards and Opportunity to Comment: CDLE actively sought the input of local Boards during the development of the waiver request. Over a period of several months, CDLE met with local directors to review their program needs, and ultimately received unanimous support for the submission of this waiver. Once the waiver document is finalized, it will be published for 30 days, beginning December 18th and ending January 18, 2007, on the public web site maintained by the Office of Workforce Development, allowing for public comment on its content and potential impact. In addition, a copy of the waiver will be available for public inspection at CDLE offices, and electronic copies of the waiver will be sent via e-mail to local Boards and workforce centers. Comments received will be provided shortly after January 18th.